

James A. Morris, Esq. (CSBN 296852)  
*jmorris@jamlawyers.com*  
Amy J. Anderson, Esq. (CSBN 301732)  
*aanderson@jamlawyers.com*  
**MORRIS LAW FIRM**  
6310 San Vicente Blvd, Suite 360  
Los Angeles, CA 90048  
Tel: 323-302-9488  
Fax: 323-931-4990

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY  
LITIGATION

No. 2:15-md-2641-PHX

**This Document Relates to:**

**MOTION FOR EXTENSION OF  
TIME TO COMPLETE PLAINTIFF  
PROFILE FORM**

***Jerry Jones v. C.R. Bard, Inc., et al.***  
**No. 2:16-cv-01314-DGC**

**MAY IT PLEASE THE COURT:**

In support of Plaintiff's Motion for Extension of Time to Complete the Plaintiff Profile Form in the above case, Plaintiff states the following:

**FACTUAL BACKGROUND**


1. Counsel for Plaintiff Jerry Jones filed his Bard IVC Short Form Complaint in the United States District Court for the District of Arizona on May 3, 2016.
2. Pursuant to Case Management Order No. 5, the Plaintiff Profile Form for Plaintiff is due July 2, 2016.
3. Plaintiff has completed and signed the Plaintiff Profile Form to the best of his ability without having access to his medical records. However, Plaintiff

1 is unable to fully and accurately respond to the entirety without those  
2 medical records.

- 3 4. Plaintiff's counsel requested Plaintiff's medical records on or before March  
4 10, 2016. Due to a number of issues with the facility, including various  
5 HIPAA authorization problems, the records have still not been provided to  
6 Plaintiff's counsel.
- 7 5. Plaintiff's medical record service has informed Plaintiff's counsel that these  
8 record have been ordered and Plaintiff's counsel are only waiting for  
9 delivery. However, Plaintiff's medical record service cannot provide any  
10 approximate time for the delivery of these records.
- 11 6. Plaintiff and Plaintiff's counsel have made substantial good faith efforts to  
12 acquire Plaintiff's medical records and the instant delay is due entirely to  
13 circumstances outside of their control.  
14

15 WHEREFORE, Plaintiffs request an extension of time of 60 days (until August  
16 31, 2016) to complete the Plaintiff Profile Form.  
17

18  
19 RESPECTFULLY SUBMITTED this 13th day of July, 2016.

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25 Fax: 323-931-4990

26 Attorneys for Plaintiff  
27  
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